

**Plaintiff Lazare Kaplan International Inc.'s
Revised Deposition Designations for Marc
Weiss 10/13/2015**

TextMap Annotation Digest Report

Case Name: Plaintiff Lazare Kaplan International Inc.'s Revised Deposition Designations for Marc Weiss
10/13/2015
Transcript: [10/13/2015] Weiss, Marc
Issue Filter: Revised Deposition Designations

Pg: 5 Ln: 5 - 9

Annotation:

5: 5 Q. Okay. Good morning, Mr. Weiss.
6 My name is Chris Sullivan and I
7 represent Lazare Kaplan International
8 and I'm with the law firm of Herrick
9 Feinstein.

Pg: 10 Ln: 2 - 8

Annotation:

10: 2 Q. Were you employed by ADB
3 continuously from December -- January
4 1, 2000 through December 31, 2010?
5 A. Yes, I was.
6 Q. Okay. And when did you actually
7 leave ADB's employment?
8 A. I left was April 30th, 2015.

Pg: 14 Ln: 9 - 13

Annotation:

14: 9 Q. As of December, 2000, how much
10 experience had you had with diamond
11 clients of ADB?
12 A. I started in November, 1999.
13 That was my experience.

Pg: 16 Ln: 13 - Pg: 17 Ln: 13

Annotation:

16:13 Q. I see. Okay. So let's talk a
14 little bit about ADB. When you first
15 started with ADB? What was your
16 position or job title there?
17 A. I was, I believe, was Senior
18 Representative Officer.
19 Q. And did you hold that position
20 in the New York office of ADB?
21 A. In the New York representative
22 offices, yes.
23 Q. Okay. And what were your
24 responsibilities in that position?
25 A. My responsibilities were
17: 1 meeting -- meeting with potential
2 prospects or clients, gathering
3 information and sending that
4 information to ADB head office for
5 review.
6 Q. And did that include diamond
7 clients of ADB?

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Pg: 16 Ln: 13 - Pg: 17 Ln: 13 continued...

Annotation:

17: 8 A. Yes.
9 Q. And did your position at ADB
10 change during the 10 year period of
11 time that we're investigating?
12 A. During I believe around 2005 I
13 became the manager of the office.

Pg: 21 Ln: 2 - 19

Annotation:

21: 2 Q. What was the chain of command in
3 the New York office prior to 2005 when
4 you were appointed to Senior Vice
5 President and General Manager is that?
6 Who reported to who?
7 A. The department head was Peter
8 Driesen and he reported directly to
9 Philippe Loral.
10 Q. And to whom did you report?
11 A. I reported to Peter Driesen.
12 Q. And after you were appointed to
13 Senior Vice President and General
14 Manager, what was the chain of command
15 in the office?
16 A. I reported to Philippe Loral.
17 Q. And did everyone else in the
18 office report to you?
19 A. Yes.

Pg: 40 Ln: 21 - Pg: 41 Ln: 7

Annotation:

40:21 Q. What was the nature of the
22 credit facility that Lazare provided --
23 that ADB provided to Lazare? Was it a
24 working capital line of credit?
25 A. As best as I can recollect, all
41: 1 the clients had working capital lines
2 of credit. I don't recall the terms and
3 additions but there were -- as best as
4 I can recollect, they were all working
5 capital lines of credit.
6 Q. And that would include Lazare?
7 A. Yes.

Pg: 56 Ln: 20 - Pg: 57 Ln: 3

Annotation:

56:20 Q. Would you look at Plaintiff's

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Pg: 56 Ln: 20 - Pg: 57 Ln: 3 continued...

Annotation:

56:21 Exhibit 55 in the same binder that is
22 in front of you? Do you recognize this
23 document?
24 A. Yes.
25 Q. What is it?
57: 1 A. It's an authorization between
2 ADB and the client to exchange
3 information.

Pg: 58 Ln: 1 - Pg: 59 Ln: 11

Annotation:

58: 1 Q. Did any of your clients sign
2 either a document in this form or
3 substantially in this form?
4 A. Yes, they did.
5 Q. Did they all do so?
6 A. I believe so.
7 Q. And did you prepare any of those
8 documents?
9 MS. GREDD: Objection to form.
10 A. You mean --
11 Q. -- that your clients signed?
12 A. I didn't prepare any documents.
13 I gave documents for the clients to
14 sign.
15 Q. And directing your attention to
16 the first sentence that reads, "We
17 hereby agree that all disbursements and
18 payments under our credit facility
19 shall be effected", etcetera, do you
20 understand that sentence to require
21 that all disbursements and payments
22 under the client's credit facility with
23 ADB must be effected through its bank
24 account at KBC New York or is it
25 optional?
59: 1 A. I believe the intent is that all
2 the payments should be processed
3 through the account with KBC New York.
4 Q. Is that mandatory or optional,
5 according to your understanding?
6 A. I'm not a lawyer.
7 Q. But do you have an understanding
8 as a banker?
9 A. As a banker, the purpose was
10 that they should make -- put all their
11 payments through KBC New York.

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Pg: 59 Ln: 18 - Pg: 60 Ln: 10

Annotation:

59:18 Q. Do you understand this document
19 to be -- to have been provided to KBC
20 New York --
21 MS. GREDD: Objection to form.
22 Q. -- Plaintiff's Exhibit 55?
23 A. This was provided to the clients
24 to sign.
25 Q. And what happened to the
60: 1 documents after the client signed it?
2 MS. GREDD: Are you referring
3 specifically to the Lazare document?
4 MR. SULLIVAN: Yes. Plaintiff's
5 Exhibit 55.
6 A. A copy was -- a copy was given
7 to KBC and to ADB.
8 Q. What happened to the original,
9 if you know?
10 A. Oh, I don't know.

Pg: 192 Ln: 19 - Pg: 193 Ln: 1

Annotation:

192:19 Q. Did ADB need the approval of KBC
20 to grant credit lines in excess of a
21 certain amount?
22 A. I believe they needed -- I
23 needed -- I believe that ADB did need
24 KBC above certain amounts but I don't
25 recall what the amounts were at the
193: 1 time.